

LAMONICA HERBST & MANISCALCO, LLP

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January 3, 2020

By ECF & E-Mail

Honorable James L. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408
Garrity.chambers@nysb.uscourts.gov

MEMORANDUM ENDORSED ORDER

The adjournment requested herein is granted. All matters in this case are hereby adjourned to February 12, 2020 at 10:00am (EST). Debtor's Counsel shall file with the Court (and deliver two single-sided copies to Chambers) a Status Report by February 5, 2020 at 4:00pm (EST).

**Re: Penny Ann Bradley
Chapter 11
Case No. 18-10122 (JLG)**

Dated: January 8, 2020
New York, NY

/s/ James L. Garrity, Jr.
Honorable James L. Garrity Jr.
United States Bankruptcy Judge

Dear Judge Garrity:

This firm is special counsel to Penny Ann Bradley (the "Debtor"). The Debtor is pleased to report that a resolution of the claims of Lewis H. Berman LLC has occurred and the Debtor is in the process of preparing a Stipulation, which will be filed with the Court for approval.

The following matters are currently scheduled for a hearing on January 8, 2020:

- (i) Case Status Conference;
- (ii) The Motion of NSM82 LLC to Appoint a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a) [Dkt. No. 131] (the "NSM Motion");
- (iii) The Motion of Lewis H. Berman LLC ("Berman") to Appoint a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a) [Dkt. No. 167] (the "Berman Motion");
- (iv) The Debtor's Objection to Proof of Claim Number 3 Filed by Atlas Union Corp. ("Atlas") [Dkt. No. 172] (the "Atlas Claim Objection");
- (v) The Debtor's Objection to Proof of Claim Number 6 Filed by Russell and Lydia Pollack (the "Pollacks") [Dkt. No. 183] (the "Pollack Claim Objection"); and
- (vi) The United States Trustee's (the "UST") Motion to Convert This Case to a Case Under Chapter 7 [Dkt. No. 185] (the "UST Motion").

As a result of the Berman resolution, the Debtor and Berman request that the Berman Motion be adjourned.

Discussions have been ongoing with the UST and the Debtor and the UST request that the UST Motion be adjourned as well.

The Debtor is fairly close to resolving claims with Pollack and the parties thereto would request that the Pollack Claim Objection be adjourned as well.

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Atlas and NSM have agree to adjourn the NSM Motion and the Atlas Claim Objection and we are awaiting a response.

In view of the above, the Debtor would request that the Case Status conference also be adjourned. Therefore, all matters in the Debtor's case would be adjourned.

Thank you for your consideration.

Respectfully submitted,
s/ Joseph S. Maniscalco
Joseph S. Maniscalco

cc: Nolan E. Shanahan, Esq; Jacob S. Frumkin, Esq.;
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